

Small MS4 Annual Report Guidance

This annual report guidance (Guidance) is intended to assist dischargers permitted under the Small Municipal Separate Storm Sewer System General Permit (General Permit) with evaluating their storm water program and preparing a report of the status of measurable goals, as required by the General Permit. While it addresses the suggested Annual Report Form provided by the state, you are not required to use the form and may submit an annual report in a different format. Use of this form does not guarantee compliance with the General Permit's annual reporting requirements, nor does it in any way establish new regulatory requirements, or change existing regulatory requirements.

This document begins with general notes, then provides specific guidance on completing the suggested Annual Report Form, and finally provides a series of "brainstorming" questions meant to initiate the program evaluation process and to suggest features of your program to discuss in an annual report.

General Notes

The General Permit requires an annual evaluation of program effectiveness. It is important to evaluate your program's strengths and weaknesses so that it may evolve to become more effective over time. Effectiveness is a measure of how well your program is working and has two components: Best Management Practice (BMP) selection and BMP implementation.

Use of Assessment Parameters

Assessment parameters are quantifiable measurements that indicate or reflect BMP or minimum control measure (MCM) effectiveness. Once a permittee chooses an assessment parameter, the permittee can then record data over time and use the data, as a yard-stick associated with BMP or MCM effectiveness.

Assessment parameters should not be confused with "measurable goals." Even though both are quantifiable, an assessment parameter serves a different purpose from a measurable goal. A measurable goal indicates effort (i.e. miles of roads swept, number of storm water brochures distributed, etc.), while an assessment parameter is related to effectiveness.

As an example of an assessment parameter, "Number of Illicit Discharge Hotline Calls Received from the Public" is one because it is a yard-stick that can indicate or reflects effectiveness. It could quantitatively indicate (directly or indirectly) that the public education MCM is working, as more members of the public know of the hotline number and are using it to protect water quality. It could also reflect a need to improve the Illicit Discharge MCM, as the ordinances may not be deterring illicit discharges. In any event, it is useful to keep track of that parameter, as the data sheds light on historical trends, and allows the permittee to compare its own efforts with real world indicators. You may discuss your use of assessment parameters in Section D.b. of the Annual Report Form.

Completing the Annual Report Form

The following provides assistance for completing the Annual Report Form provided by the State Water Resources Control Board (SWRCB). Using the Form is not a requirement, as you may choose to comply with the General Permit's annual report requirements by using your own format.

Section A: Permittee Information

Provide the requested information. Check the boxes if the information being provided has changed since previous submittals.

Section B: Reporting Period

Check the box that corresponds to the appropriate reporting period. If this is the first reporting period, also write the date that you received permit coverage within the parentheses.

Section C: Executive Summary

The Executive Summary briefly covers all of the major sections of the annual report. In completing the Executive Summary, the preparer should answer the following questions:

- How effective was your program at reducing pollutants in your storm water discharge?
- Were you in compliance with the General Permit?
- What was the most successful part of the program?
- What was the most challenging?

This section will likely comprise about half of a page, but could be longer or shorter, depending on the scope of your SWMP.

Section D: Minimum Control Measures

The table provided may be used to list your BMPs and whether they were effective, not effective, or of unknown effectiveness. Also, indicate whether each associated measurable goal was completed, not completed, or modified. Use the narrative to justify measurable goals that were not completed and to discuss assessing effectiveness.

a. BMPs

In addressing the following sections, it may be helpful to draw from the thoughts, discussions, and results of your brain storming session.

- i. Give a general summary of the BMPs implemented for this minimum control measure. How much did the success of the particular BMP have on the overall minimum control measure?
- ii. Describe whether each measurable goal was completed within the time proposed in the SWMP. If they were not completed, provide justification.
- iii. Assess the appropriateness of each identified BMP. Factors to consider in determining appropriateness include, but are not limited to, appropriate for local population, pollution sources, receiving water concerns, and integration with local management procedures.
- iv. Discuss the effectiveness of your individual BMPs and their effectiveness when implemented together under one minimum control measure. Describe your progress towards achieving the statutory goal of reducing the discharge of pollutants to the Maximum Extent Practicable (MEP). What indicators (assessment parameters) have you used to determine this?

- v. Summarize any proposed change(s) to the SWMP. Because opportunities for improvement often become apparent during periodic evaluation, you should propose any necessary SWMP modifications (accompanied by justification) during the annual reporting process. Proposed SWMP modifications must follow the same formal approval procedure as the initial SWMP application, and do not become effective until a modified SWMP is approved.

b. Results of Information Collected, If Any

Water Quality monitoring is not a requirement under the permit. However, if you did collect any water quality monitoring data for storm water discharges within your jurisdiction, you must summarize your results here. Additionally, if any program elements included data collection, you must submit a short summary of the information and any analysis completed. For example, you may report your assessment parameter data (miles of riverbank cleaned up, number of hits on a website before and after a public education campaign, survey/polling results, etc.). Data listed under Item 1.c, Measurable Goals, does not need to be repeated here.

c. Upcoming Activities

Provide a short summary based on your existing SWMP implementation schedule of upcoming activities. If the upcoming activities are already fully described in the SWMP, it is not necessary to repeat the information in the annual report. If any changes to the descriptions provided in the application or previous reports are proposed, they should be summarized along with an explanation as to why the change is necessary or appropriate. Proposed changes do not become effective unless a modified SWMP is formally approved.

Brain Storming Questions

These questions are meant to be used as a tool by the preparer of the annual report. The questions can generate discussion or thoughts on what the results of BMP implementation indicate and ways that program progress can be tracked or conveyed over time. The answers to the questions are not required in the annual report; furthermore, some of the questions may not be applicable to your SWMP. However, this is by no means an exhaustive list. Additional questions and answers pertinent to the specific program should be generated.

General

What informal relationships exist in regards to implementing your SWMP? Are informal relationships proving to be helpful? Can they be utilized in other areas? Can they be improved upon?

In terms of program coordination, what parts are working particularly well? Which aspects need improvements?

Do you have regularly scheduled storm water workgroup meetings? If yes, what are the participants' affiliations?

Is implementation of the SWMP multi-departmental? Is there a particular department that is not as cooperative? What may be some reasons for this and how might the issues be resolved?

What staff training was conducted over the last reporting year? How does this compare with past years? What staff were targeted for which program areas? How were positions targeted for certain training? Was the training effective? How did you measure the training effectiveness? Do you propose to change things? If yes, how will the training be changed and why will it be changed?

The following chart may be used to summarize training activities and training trends.

Class	Date	Department(s) in Attendance	Effectiveness	Number of Participants	Number of Participants – Previous Year
Other	-	-	-	-	
Total					

Have there been any instances in which a storm water ordinance did not provide the authority necessary to stop unauthorized discharges and/or enforce storm water requirements? Why? What is being done to correct this deficiency?

How does the quality of your water resources compare with other communities? How does your storm water program compare with other communities' programs?

Was there a particular focus of your program this year? Why? Will that change over the next five years?

Has your program reduced pollutant loadings from your storm water discharges?

Does your program utilize community resources (natural resources as well as existing organizations, infrastructure, etc.)? For example, does your education program explain the connection between storm water quality and the quality of *local* waterbodies? Do you encourage Girl and Boy Scout troops to participate in creek clean-ups? Do you use pre-treatment or CUPA inspectors to look for storm water violations?

How often are policies revisited?

What Minimum Control Measure requires the most resources (staff time, contract money, capital expenditures, maintenance, etc.)? What Minimum Control Measure requires the least? What BMP requires the most resources? What BMP requires the least? In general, are the BMPs that require more resources also the ones that are most effective?

Public Education and Outreach

Have you or are you planning to provide storm water education and outreach material in multiple languages?

Are certain community demographics more receptive to environmental issues? How might you reach out to those that do not appear to be as receptive?

What types of business outreach activities have been conducted?

What percentage of the population do you estimate you have reached with your different types of outreach?

How much time is dedicated to public inquires and requests for additional information?

Has awareness regarding storm water pollution increased in your community? How was this measured?

How did you seek survey participation? Was it difficult to get enough participants?

Has the program led to or will it lead to behavioral changes? How is this evaluated?

Public Involvement and Participation

Is the public participating in your storm water program? Are the meeting times or locations hindering participation?

How many people or community groups have gotten involved in your storm water program? Is there any correlation with your storm water education campaigns?

How does involvement in the storm water program compare to involvement in other similar programs in the community?

If you have a storm water hotline, has the number of calls increased or decreased?

Illicit Discharge Detection and Elimination

If you have a storm water hotline, has the number of calls increased or decreased? Are legitimate storm water issues reported? Is the hotline being abused (i.e. used as a weapon between quarreling neighbors)? Are there any trends in the calls (e.g. recurring neighborhoods, same types of discharges)? Do you ask how people learned about the hotline? Do you track that information?

Do you receive public complaints directly from the internet?

How much time is spent detecting illicit discharges? Are you able to effectively trace the illicit discharge back to its source? How much time is spent identifying the sources of illicit discharges? Describe the process for taking enforcement actions for illicit discharges, including the types of actions that are taken and the procedures for resolving them. Are the enforcement actions appropriate for the violations? Are they too harsh to typically be invoked or too lenient to provide deterrence?

How does the amount of resources spent on education compare to the amount spent on enforcement? How has this changed over time?

Did you prioritize certain areas of the community (e.g. geographic, types of businesses, types or land use, etc.) for illicit discharge detection activities? Has this prioritization enabled you to leverage and stretch your resources to reduce more storm water pollution at a lesser cost?

The following chart can be used to track illicit discharge detection and elimination results over time.

	Issue	This Reporting Period	Previous Reporting Period	Comments (such as type/source, geographic location, time, etc.)
1)	How many non-storm water discharges were detected during the reporting year			
2)	How many of these were “illicit” (i.e. not authorized)?			
3)	How many illicit dischargers were fined or otherwise penalized?			

Construction Site Storm Water Management

Do you require an erosion and sediment control plan? If yes, how are they reviewed and approved? Do you require the preparation, submittal, approval, and implementation of a Storm Water Pollution Prevention Plan (SWPPP) or equivalent prior to the issuance of a grading permit?

How do site plans and erosion and sediment control plans compare to conditions in the field?

How many plans included adequate erosion and sediment controls/storm water BMPs upon the first submittal? In general, are multiple re-submittals required before storm water management controls are adequate?

Describe the process for taking enforcement actions for construction site violations, including the types of actions that are taken and the procedures for resolving them. Are the enforcement actions appropriate for the violations? Are they too harsh to typically be invoked or too lenient to provide deterrence?

How does the amount of resources spent on education compare to the amount spent on enforcement? How has this changed over time?

Describe how you track the issuance of grading permits, building permits, and other construction-related permits.

The following table can be used to track your construction program activities.

	Issue	This Reporting Period	Last Reporting Period	Comments
1)	How many erosion and sediment control plans were reviewed?			
2)	How many construction sites were			

	inspected to determine compliance with your construction storm water requirements?			
3)	At how many construction sites were violations noted?			
4)	At these sites, how many site owners or operators were penalized through a formal enforcement action?			

Post-Construction Storm Water Management

Have you modified your planning procedures? In preparing and reviewing CEQA documents, do you consider potential storm water quality impacts and provide for appropriate mitigation? Can you provide examples showing how storm water quality impacts were addressed in CEQA documents for projects over the reporting period?

Have you implemented a system (such as a database) to track the type and location of installed post-construction BMPs?

What mechanism is used to require proper operation and maintenance of post-construction BMPs? Do inspections or complaints verify that this mechanism works?

How many plans included adequate post-construction BMPs upon the first submittal?

The following table can be used to summarize results of your post-construction program.

	Issue	This Reporting Period	Last Reporting Period	Comments (ex. frequently seen project types, types of BMPs)
1)	How many post-construction plans were reviewed?			
2)	How many plans included post-construction BMPs?			
3)	How many sites were inspected to verify installation of post-construction BMPs?			
4)	How many sites were inspected to verify the proper operation and maintenance of post-construction BMPs?			

Pollution Prevention and Good Housekeeping for Municipal Operations

How are municipal programs and activities reviewed? How many changes were implemented?

How much debris is collected during street sweeping? Is this a decrease? Is more debris collected from certain streets in your jurisdiction than from others? Have you experimented with increasing frequencies? What were the results? Are parked cars a problem?

Have the number of flood events increased or decreased during program implementation?

Have there been changes in uses of landscaping fertilizers, pesticides, and herbicides?